



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

Wa 6906
7-8-87
5f

July 8, 1987

REPLY TO
ATTN OF:

SO-125

Dr. Bryant Adams, Environmental Coordinator
Pacific Wood Treatment Corporation
111 W. Division Street
Ridgefield, Washington 98642

Re: EPA v. Pacific Wood Treating Corporation,
Docket No. 1085-09-26-3008P

Dear Dr. Adams:

This letter will confirm a meeting scheduled at your request between the Environmental Protection Agency (EPA) and Pacific Wood Treating Corporation (PWT) on Tuesday, July 21, 1987. The meeting will be held at EPA offices in Seattle, Washington at 10:00 a.m., in the eleventh floor conference room at the above address.

The purpose of the meeting is to discuss the plan submitted by PWT pursuant to the Consent Order in this matter, and EPA's review of that plan as stated in a June 15, 1987 letter to PWT. EPA's evaluation of the plan was done in accordance with paragraph 7 of the Order, which incorporates the review process set forth in 40 CFR § 265.112(d)(4). That provision allows EPA to review a closure plan and require changes to the plan by the submitting party. That provision also requires a revised plan in response to EPA's comments within thirty days of receipt of those comments. Because of your concerns about the comments, EPA will allow you thirty (30) days from the date of the meeting to submit a revised plan, based upon our upcoming discussions.

In the June 15 comment letter regarding your submittal, a reference was made to the lack of stated frequency of analysis for pentachlorophenol and arsenic. As Marcia Bailey advised you in a recent telephone conversation, that comment is withdrawn by EPA, as the cross-reference of those analyses in Table 2 of the submittal was subsequently noted. The remaining comments in the letter are still of concern to EPA.

Under the Consent Order, deferred penalties become due unless PWT proceeds in fulfilling its responsibilities under the Order in a timely fashion. The Order provides for a review of PWT's timely implementation of the Order provisions in



October of 1987. EPA expects substantial and real progress towards implementation of the closure plan by that time.

If you have further comments on the matter, please contact me at 442-1191, or Ms. Bailey at 442-0694.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. Henry Elsen". The signature is fluid and cursive, with the first name "D." and last name "Elsen" clearly distinguishable.

D. Henry Elsen
Assistant Regional Counsel

cc: Bill Maer, Attorney

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Under the Consent Order, deferred penalties become due unless PWT proceeds in fulfilling its responsibilities under the Order in a timely fashion. We hope this meeting will resolve remaining differences on the plan such that PWT can meet that obligation by submitting an appropriate plan soon. The Order provides for a review of PWT's timely implementation

of the Order provisions in October of 1987. EPA expects substantial and real progress towards implementation of the closure plan by that time.

If you have further comments on the matter, please contact me at 442-1191, or Ms. Bailey at 442-0694.

Sincerely,

D. Henry Elsen
Assistant Regional Counsel

cc: Bill Maer, Attorney

bcc: Bailey